

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|-------------------------------------|---|----------------------|
| In re: | § | |
| | § | |
| | § | Case No. 23-42104-EB |
| TIGHT ENDS SPORTS BAR & GRILL, LLC, | § | |
| | § | Chapter 11-TXEB |
| Debtor. | § | |
| <hr/> | | |
| | § | |
| SALT & PEPPER RESTAURANTS LLC, | § | |
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | Adv. No. 23-03245 |
| | § | |
| TIGHT ENDS SPORTS BAR & GRILL, LLC | § | |
| and TIMOTHY DUNGAN, | § | |
| | § | |
| Defendants. | § | |
| | § | |

STATEMENT PURSUANT TO LBR 9027-3

Plaintiff, Salt & Pepper Restaurants, LLC (the “Plaintiff”) hereby files its statement pursuant to Local Bankruptcy Rule 9027-3.

Plaintiff admits that its claims against Debtor only, Tight Ends Sports Bar & Grill, LLC. (“Debtor”) constitute core proceedings pursuant to 28 U.S.C § 157(b)(2)(B). Plaintiff does not consent to the entry of final orders of judgments by the bankruptcy judge if it is determined that the bankruptcy judge, absent consent the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Plaintiff denies that its claims against non-debtor Timothy Dungan (“Dungan”) constitute core matters pursuant to 28 U.S.C. § 157(b)(2). Plaintiff also denies that this Court has related to jurisdiction over Plaintiff’s claims against Dungan. Plaintiff does not consent to the entry of final orders or judgments by the bankruptcy judge if it is determined that the bankruptcy judge, absent

consent the parties, cannot enter file orders or judgments consistent with Article III of the United States Constitution.

Respectfully submitted this 4th day of December, 2023.

GRAY REED

By: /s/ Micheal W. Bishop
Micheal W. Bishop
Texas Bar No. 02354860
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: mbishop@grayreed.com

-and-

Preston T. Kamin
Texas Bar No. 24062817
1300 Post Oak Blvd., Suite 2000
Houston, Texas 77056
Telephone: (713) 986-7000
Facsimile: (713) 986-7100
Email: pkamin@grayreed.com

Counsel to Salt & Pepper Restaurants LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 4, 2023, a true and correct copy of the foregoing document was served via the Court's CM/ECF filing system upon those parties who have so-subscribed, and upon the following persons via electronic mail and U.S. First Class Mail, Postage Pre-Paid (unless otherwise indicated.)

Scott Seidel
Sub V Chapter Trustee
6505 West Park Blvd., Suite 306
Plano, Texas 75093
scott@scottseidel.com

John M. Vardeman
UST Office
110 N. College Avenue, Suite 300
Tyler, Texas 75702
john.m.vardeman@usdoj.gov

Jeff Carruth
Weycer, Kaplan, Pulaski & Zuber, P.C.
2608 Hibernia, Suite 105
Dallas, Texas 75024
jcarruth@wkpz.com

(Via US first class mail, postage pre-paid)
Timothy Dungan
5584 State Highway 121
Plano, Texas 75024

/s/ Micheal W. Bishop
Micheal W. Bishop